

**UNITED STATES DISTRICT  
COURT NORTHERN DISTRICT OF  
GEORGIA ATLANTA DIVISION**

VOTE.ORG; GEORGIA ALLIANCE FOR  
RETIRED AMERICANS; and  
PRIORITIES USA,

Plaintiffs,

v.

GEORGIA STATE ELECTION BOARD,  
et al.,

Defendants,

GEORGIA REPUBLICAN PARTY, INC.;  
and REPUBLICAN NATIONAL  
COMMITTEE, et al.,

Intervenor-Defendants.

Case No. 1:22-cv-01734-JPB

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

COME NOW Plaintiffs, Defendants, and Intervenor-Defendants (collectively the “Parties”) jointly move the Court for the Entry of the attached Stipulated Protective Order and show the Court as follows:

1. The Court opened discovery in this matter on March 9, 2023. (Doc. 59).

The Parties are actively engaged in the discovery process.

2. During the discovery process the Parties discovered that the information

being exchanged in this matter includes highly sensitive information, including but not limited to, Particular Individual Information of voters – (e.g., voters’ birth dates, social security numbers, addresses, telephone numbers, and email addresses).

3. Because of the sensitive nature of the information that is being exchanged, the Parties seek to provide limitations on the disclosure of confidential material exchanged during discovery in this matter.
4. The purpose of the Stipulated Protective Order is to protect against the unauthorized and/or unnecessary disclosure of confidential information.
5. The Parties jointly move this Court pursuant to Federal Rule of Civil Procedure 26(c), which provides that a protective order may issue “for good cause” to protect a person from “annoyance, embarrassment, oppression, or undue burden or expense.”
6. Whether good cause exists is a factual question turning on, *inter alia*, the nature of the information at issue. *Chicago Tribune Co. v. Bridgestone/Firestone, Inc.*, 263 F.3d 1304, 1315 (11th Cir. 2001). An important factor in this calculation is whether an order is necessary to protect legitimate privacy interests. *Romero v. Drummond Co.*, 480 F.3d 1234, 1246 (11th Cir. 2007); *Luzzi v. ATP Tour, Inc.*, No. 3:09-cv-1155,

2011 WL 2693542, at \*3 (M.D. Fla. July 12, 2011) (“The Eleventh Circuit has held that legitimate privacy interests are an important factor to be considered.”).

7. The Parties submit that this Stipulated Protective Order is necessary to protect the privacy interest of the voters and to protect their confidential information from being misused.
8. Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Parties jointly request that the Court issue the Stipulated Protective Order in this matter to protect any confidential information exchanged during discovery.
9. The Parties have prepared a proposed Stipulated Consent Protective Order for the Court’s consideration and attached it hereto as an exhibit to this Motion.
10. The Parties understand that the entry of the accompanying Stipulated Protective Order will not affect the Court’s ability to modify the Order or enter additional protection at any time during the pendency of this litigation.
11. The Parties respectfully move this Court for entry of the Stipulated Protective Order, pursuant to Rule 26(c) of the Federal Rules of Civil

Procedure, to protect the confidentiality of certain information and to facilitate discovery.

Respectfully Submitted this 29<sup>th</sup> day of June, 2023.

**OFFICE OF THE FULTON COUNTY  
ATTORNEY**

Y. Soo Jo  
County Attorney

Kaye Woodard Burwell  
Deputy County Counsel  
Georgia Bar No. 775060  
[kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov)

Shalanda M. J. Miller  
Deputy County Counsel  
Georgia Bar No. 122544  
[shalanda.miller@fultoncountyga.gov](mailto:shalanda.miller@fultoncountyga.gov)

David R. Lowman  
Supervising County Counsel  
Georgia Bar No. 460298  
[david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov)

**/s/ Juliana Sleeper**  
Juliana Y. Sleeper  
Senior Assistant County Counsel  
Georgia Bar No. 376099  
[juliana.sleeper@fultoncountyga.gov](mailto:juliana.sleeper@fultoncountyga.gov)

**Attorneys for County Defendants**

141 Pryor Street, SW, Suite 4038  
Atlanta, Georgia 30303  
(404) 612-0246 (office)|(404) 730-6324 (facsimile)

/s/ Adam M. Sparks

Adam M. Sparks  
Georgia Bar No. 341578  
**KREVOLIN & HORST, LLC**  
One Atlantic Center  
1201 West Peachtree Street, NW,  
Suite 3250  
Atlanta, Georgia 30309  
Telephone: (404) 888-9700  
Facsimile: (404) 888-9577  
Email: Sparks@khlawfirm.com

*Counsel for Plaintiffs*

/s/ Michael B. Jones

Uzoma N. Nkwonta\*  
Noah B. Baron\*  
Michael B. Jones (GA Bar No. 721264)  
Marcos Mocine-McQueen\*  
Meaghan Mixon\*\*  
**ELIAS LAW GROUP LLP**  
250 Massachusetts Ave. NW, Suite 400  
Washington, D.C. 20001  
Telephone: (202) 968-4490  
Facsimile: (202) 968-4498  
unkwonta@elias.law  
nbaron@elias.law  
mjones@elias.law  
mmcqueen@elias.law  
mmixon@elias.law

*Counsel for Plaintiffs*

\*Admitted *Pro Hac Vice*

\*\**Pro Hac Vice* application forthcoming

Christopher M. Carr  
Attorney General  
Georgia Bar No. 112505  
Bryan K. Webb  
Deputy Attorney General  
Georgia Bar No. 743580  
Russell D. Willard  
Senior Assistant Attorney General  
Georgia Bar No. 760280  
Charlene McGowan  
Assistant Attorney General  
Georgia Bar No. 697316  
**State Law Department**  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334

*Counsel for State Defendants*

Gene C. Schaerr\*  
Special Assistant Attorney General  
Erik Jaffe\*  
H. Christopher Bartolomucci\*  
Brian J. Field\*  
Joshua J. Prince\*  
**Schaerr | Jaffe LLP**  
1717 K Street NW, Suite 900  
Washington, DC 20006  
(202) 787-1060  
gschaerr@schaerr-jaffe.com  
/s/ **Bryan P. Tyson**  
Bryan P. Tyson  
Special Assistant Attorney General  
Georgia Bar No. 515411  
btyson@taylorenghish.com  
Bryan F. Jacoutot  
Georgia Bar No. 668272  
bjacoutot@taylorenghish.com  
Loree Anne Paradise  
Georgia Bar No. 382202  
lparadise@taylorenghish.com  
Diane Festin LaRoss  
Georgia Bar No. 430830  
dlaross@taylorenghish.com  
Deborah A. Ausburn  
Georgia Bar No. 028610  
dausburn@taylorenghish.com  
Daniel H. Weigel  
Georgia Bar No. 956419  
dweigel@taylorenghish.com  
Tobias C. Tatum, Sr.  
Georgia Bar No. 307104  
ttatum@taylorenghish.com  
**Taylor English Duma LLP**  
1600 Parkwood Circle  
Atlanta, Georgia 30339

(678) 336-7249

Counsel for State Defendants  
\*Admitted pro hac vice

Harmeet K. Dhillon\*  
DHILLON LAW GROUP, INC.  
177 Post Street, Suite 700  
San Francisco, California 94108  
Telephone: 415.433.1700  
Facsimile: 415.520.6593  
harmeet@dhillonlaw.com

**/s/ Gary M. Lawkowski**

David A. Warrington\*  
Gary M. Lawkowski\*  
DHILLON LAW GROUP, INC.  
2121 Eisenhower Ave, Suite 608  
Alexandria, Virginia 22314  
Phone: 703.574.1206  
Facsimile: 415.520.6593  
dwarrington@dhillonlaw.com  
glawkowski@dhillonlaw.com

William Bradley Carver, Sr.  
Georgia Bar No. 115529  
Alex Kaufman  
Georgia Bar No. 136097  
Jake Evans  
Georgia Bar No. 797018  
Baxter D. Drennon\*  
W. Dowdy White  
Georgia Bar No. 320879  
HALL BOOTH SMITH, P.C.  
191 Peachtree Street, NE, Suite 2900  
Atlanta, Georgia 30303  
Telephone: 404.854.6967  
[bcarver@hallboothsmith.com](mailto:bcarver@hallboothsmith.com)  
[jevans@hallboothsmith.com](mailto:jevans@hallboothsmith.com)  
[akaufman@hallboothsmith.com](mailto:akaufman@hallboothsmith.com)  
[bdrennon@hallboothsmith.com](mailto:bdrennon@hallboothsmith.com)  
dwhite@hallboothsmith.com

*\*Admitted pro hac vice.*

*Counsel for Intervenor-Defendants Georgia Republican Party, Inc. and  
Republican National Committee*



**UNITED STATES DISTRICT  
COURT NORTHERN DISTRICT OF  
GEORGIA ATLANTA DIVISION**

VOTE.ORG; GEORGIA ALLIANCE FOR  
RETIRED AMERICANS; and  
PRIORITIES USA,

Plaintiffs,

v.

GEORGIA STATE ELECTION BOARD,  
et al.,

Defendants,

GEORGIA REPUBLICAN PARTY, INC.;  
and REPUBLICAN NATIONAL  
COMMITTEE, et al.,

Intervenor-Defendants.

Case No. 1:22-cv-01734-JPB

---

**CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that on this day, I presented the Joint Motion to Extend Discovery Deadline in Times New Roman, 14-point type in accordance with L.R. 5.1(C). I further certify that I electronically filed this Joint Motion to Extend Discovery Deadline with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsels of record.

This 29<sup>th</sup> day of June 2023.

/s/ **Juliana Sleeper**

Juliana Y. Sleeper

Senior Assistant County Counsel

Georgia Bar No. 376099

juliana.sleeper@fultoncountyga.gov

**Attorneys for County Defendants**